UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

Thomas Perez, Secretary of Labor United States Department of Labor (Wage and Hour Division))		
Plaintiff,)	Civil Action No.	2:16-cv-3491
v.)	CIVII Action No.	2/10/07/3131
TEAM Environmental LLC)		
Defendant.)		

COMPLAINT

Plaintiff, Thomas E. Perez, Secretary of Labor, United States Department of Labor ("Plaintiff"), brings this action to enjoin TEAM Environmental LLC ("Defendant") from violating the provisions of Sections 7 and 15(a)(2) of the Fair Labor Standards Act of 1938, as amended (29 U.S.C. § 201, et seq.), hereinafter referred to as "the Act," and for a judgment against Defendant in the total amount of back wage compensation found by the Court to be due to any former or current employees of Defendant pursuant to the Act and for liquidated damages in an amount equal to the back wages found due to the employees.

I.

Jurisdiction of this action is conferred upon the Court by Sections 16(c) and 17 of the Act, 29 U.S.C. §§ 216(c) and 217, and by 28 U.S.C. §§ 1331 and 1345.

II.

Defendant TEAM Environmental LLC is, and at all times hereinafter mentioned was, a corporation with a place of business at 50 Simmons Drive, Millwood, WV, which is within the

venue and jurisdiction of this Court. The Defendant is a construction, management, inspection and environmental service company in the natural gas industry.

III.

- 1. At all times hereinafter mentioned, Defendant has been an enterprise within the meaning of Section 3(r) of the Act, in that Defendant has been, through unified operation or common control, engaged in the performance of related activities for a common business purpose. These activities constituted (and/or were related to) the providing of various services and activities in the natural gas industry, in furtherance of the business purposes of Defendant's unified business entity.
- 2. At all times hereinafter mentioned, Defendant has been an enterprise engaged in commerce or in the production of goods for commerce within the meaning of Section 3(s)(1)(A) of the Act, in that Defendant has employees engaged in commerce or in the production of goods for commerce, or has employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce by any person and in that Defendant has an annual gross volume of sales made or business done of not less than \$500,000.00. Defendant's employees provide inspection services for the natural gas industry and regularly travel across state lines to perform work, such as in Ohio, Indiana, Pennsylvania and West Virginia. These employees regularly use goods and supplies received from out of state, such as company-owned vehicles, company-owned laptops and phones, welding tools, safety gear, measuring tools, pens, pencils, and paper.

IV.

1. During the period from workweek ending October 20, 2012 to the present or such time that Defendant came into compliance ("the investigative period"), Defendant employed

individuals to provide inspection services to gas companies to inspect the work of third party contractors. The employees listed in the attached Schedule A were primarily employed by the Defendant as inspectors (collectively referred to hereinafter as "Inspectors") during the time period covered by this Complaint. These employees were primarily coating inspectors, welding inspectors, utility inspectors, environmental inspectors, general inspectors, chief inspectors, lead inspectors, program managers, and project coordinators. The Inspectors reviewed compliance with federal and state requirements and industry guidelines for the work performed by the third party contractors. The Inspectors frequently and on a recurrent basis worked between 50-70 hours per workweek during the investigative period.

2. During the investigative period, Defendant paid the Inspectors a day rate for all hours worked, including those hours worked in excess of 40 in a workweek and did not compensate these Inspectors in accordance with Section 7 of the Act. The day rates varied by Inspector, ranging from \$350.00 to \$700.00 per day. Inspectors were paid the day rate only for days in which they reported to work, and they were not guaranteed a weekly salary. In workweeks when the Inspectors worked more than 40 hours, the Defendant paid them their established day rate for each day worked but failed to pay the Inspectors at a rate of one and one-half times their regular rate of pay for hours worked over forty in a workweek. By its pay practices, Defendant treated the Inspectors as if they were exempt from overtime payments, even though the Inspectors were not paid on a weekly salary or proper fee basis, as required by the Act and by 29 C.F.R. Part 541. Specifically, Defendant did not meet the weekly salary requirements for an exemption to apply under Section 13(a)(1) of the Act and applicable regulations at 29 CFR 541.600 et seq. The amount of weekly overtime payment Defendant owes to each Inspector varies, depending on the number of hours the Inspector actually worked each

workweek and the amount of compensation that was paid during each such workweek during the investigative period.

V.

As described in Paragraph IV, above, during the investigative period, the Defendant violated the provisions of Sections 7 and 15(a)(2) of the Act by employing the Inspectors for workweeks longer than 40 hours without compensating such Inspectors for their employment in excess of 40 hours per week at rates not less than one and one-half times the regular rates at which they were and are employed.

VI.

As a result of the violations alleged in Paragraphs IV through V above, amounts are owed for hours worked that were paid at rates less than one and one-half times their regular rates set forth in Section 7 of the Act for the Inspectors named in Schedule A attached to Plaintiff's Complaint. Additional amounts may be due to other employees employed by Defendant during the investigative period whose identities are not now known to the Plaintiff.

VII.

During the investigative period, Defendant continually violated the provisions of the Act as alleged in Paragraphs IV through V above. A judgment permanently enjoining and restraining the violations herein alleged (including restraining of withholding of overtime compensation) is specifically authorized by Section 17 of the Act, 29 U.S.C. § 217.

VIII.

A judgment granting recovery of said amounts referred to in Paragraph VI, together with an equal additional amount as liquidated damages, is specifically authorized by Section 16(c) of the Act.

WHEREFORE, cause having been shown, Plaintiff prays for judgment against the Defendant as follows:

- 1. For an Order pursuant to Section 17 of the Act permanently enjoining and restraining Defendant, as well as Defendant's officers, agents, servants, employees, and those persons in active concert or participation with Defendant who receive actual notice of any such judgment, from violating Sections 7 and 15(a)(2) of the Act;
- 2. For an Order pursuant to Section 16(c) of the Act finding Defendants liable for unpaid overtime compensation due Defendant's employees and for liquidated damages equal in amount to the unpaid compensation found due Defendant's employees listed in the attached Exhibit A. Additional overtime compensation and/or liquidated damages may be owed for the time period covered by this Complaint to certain present and former employees who were or continue to be employed by Defendant whose identities are unknown to the Plaintiff;
- 3. In the event liquidated damages are not awarded under Section 16(c) of the Act, for an Order pursuant to Section 17 of the Act enjoining and restraining Defendant and Defendant's officers, agents, servants, employees, and those persons in active concert or participation with Defendant, from withholding payment of overtime compensation found due Defendant's employees and pre-judgment interest computed at the underpayment rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621;
 - 4. For an Order awarding Plaintiff the costs of this action; and
- 5. For an Order granting such other and further relief as may be necessary and appropriate.

Respectfully submitted,

M. Patricia Smith Solicitor of Labor

Oscar L. Hampton III Regional Solicitor

Douglas N. White Associate Regional Solicitor Philip H. Wright Attorney for the United States Acting Under Authority Conferred by 28 U.S.C. § 515

/s/Pollyanna E.F. Hampton

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Exhibit A

- 1. STEVEN E ADAMS
- 2. DAVID E ALEXANDER
- 3. JOSHUA D ALEXANDER
- 4. NICHOLAS E ALEXANDER
- 5. VESTA S ALEXANDER
- 6. ERIC S ALKIRE
- 7. RICHARD V ANDERSON
- 8. TENISHA V ANDERSON
- 9. AUSTIN L ANTRIM
- 10. WILLIAM C ARMSTRONG
- 11. ISHMAEL BAILEY
- 12. BRYAN J BARNETTE
- 13. TERRY A BENNETT
- 14. KENNETH W BENSON
- 15. CRAIG E BILLS
- 16. ANNE H BLASKA
- 17. DAVID B BLOUIR
- 18. ROBERT T BOLAND
- 19. FRANK S BOROVICHKA
- 20. LARRY J
- 21. BRIAN P BOWMAN
- 22. BRENT A BOYD
- 23. JOHN E BOYER
- 24. CARLOS I BROWN
- 25. JAMES C BROWN
- 26. LYNN BROWN
- 27. STEVEN R BROWNING
- 28. CHAD L BURGH
- 29. PAUL A BURKE
- 30. JOSHUA K BURKETT
- 31. RONALD BUZZARD
- 32. THOMAS J CAMERON JR
- 33. JOSEPH A CAMPBELL
- 34. MATTHEW D CARLE
- 35. TIMOTHY W CARPER
- 36. DEREK A CASTLE
- 37. ALLEN R CASTO
- 38. KRISTOPHER S CASTO
- 39. STEVEN C CASTO
- 40. DAVID M CLARK
- 41. STEVEN I CLIFTON
- 42. CHET D COGAR
- 43. BRUCE A COINER
- 44. JOSEPH R CONTIC

- 45. DAVID S COOPER
- 46. MARK A COOPER JR
- 47. ROCKY W CORBIN
- 48. KRISTINA M COSTANZO
- 49. FRANK G CRAYCROFT
- 50. BARBARA J CRINKEY
- 51. GARY A CROSS
- 52. KEVIN L CURREY
- 53. BRYAN A DAKE
- 54. DELLA J DALLEVALLE
- 55. DOUGLAS W DAVENPORT
- 56. STEPHEN R DAVIS
- 57. JEFFREY R DAY
- 58. JAMES D DELAUDER
- 59. JOSEPH J DEPROSPERO
- 60. EDWARD B DEWITT JR
- 61. ROLAND D DILLEY
- 62. LUKE M DIXON
- 63. CHAD A DLUGOPOLSKI
- 64. RYAN C DOOLEY
- 65. CHARLES T DRAKE
- 66. MARK N ENGEL
- 67. STEPHEN J ESTES
- 68. DANIEL FANCIULLACCI
- 69. JOSEPH L FERGUSON
- 70. JAMES E FISHER
- 71. GAYLA M FITZWATER
- 72. BOCEPHUS A FLEMING
- 73. JOHN D FLINN
- 74. OLIVER K FRAZIER
- 75. GLENN L GARBER
- 76. CHRISTOPHER M GEORGE
- 77. ROBERT A GERDA
- 78. BRYAN S GIBSON
- 79. JOHNNY M GIBSON
- 80. AARON J GILMORE
- 81. RONALD W GOLDEN
- 82. DONALD W GOODWIN JR
- 83. MATTHEW J GOURLEY
- 84. DARREN W GRAHAM
- 85. ROGER D GRALEY
- 86. WILLIAM C GRALEY
- 87. RICKEY A GREEN
- 88. JODY L GUYNES
- 89. ELLIOTT G HALE
- 90. RODNEY W HAMILTON

- 91. BRANDON J HART
- 92. PHILLIP D HAUGHT
- 93. PATRICIA A HEISHMAN
- 94. WILLIAM J HILLMAN
- 95. BEN B HIX
- 96. BRIAN A HODGE
- 97. RONALD D HOELEWYN
- 98. RONALD E HOFF
- 99. MATTHEW F HONEYCUTT
- 100. TROY A HOPKINS
- 101. RONALD D HORACECK
- 102. THOMAS N HOSKINSON
- 103. GERRY L HOWARD
- 104. DUSTIN D HUGHES
- 105. ROCKY J HUNTER
- 106. KENNETH E HURD
- 107. TRAVIS L HUSKINS
- 108. JULIAN C INGRAM
- 109. JAMES C JACOBSON
- 110. EARL A JARRELL
- 111. JOE G JASTER
- 112. JERRY L JEFFREY
- 113. KERWIN L JEFFREY JR
- 114. BILLY J JOHNSON
- 115. CHADWICK Q JOHNSON
- 116. CHARLES S JOHNSON
- 117. CHRIS B JOHNSON
- 118. DENNIS L JOHNSON
- 119. JOSHUA B JOHNSON
- 120. STEVE M JOHNSON
- 121. DAVID K JONES
- 122. JUSTIN C JONES
- 123. PATTI L JONES
- 124. SAMUEL J JONES
- 125. JOSEPH W KELLER JR
- 126. JOHN F KENNEDY
- 127. DAVID M KERR
- 128. THOMAS J KIBBLE
- 129. TARA L KILLEN
- 130. DONALD KINDEL
- 131. MICHAEL L KIRSCHTEN
- 132. DANIEL L KNIGHT
- 133. DOUGLAS A KRAUSS
- 134. LENNIS A KRUIZENGA
- 135. JOSEPH M LACHANCE
- 136. ROBERT A LAKE

- 137. ROBERT C LAMB
- 138. RAY A LAMBERT
- 139. DAVID P LANCASTER
- 140. RYAN C LANIER
- 141. ANDREW D LIFE
- 142. ZACHARY G LIOTUS
- 143. SCOTT T LOUTNER
- 144. JONATHAN LYTLE
- 145. JOHN W MACDONALD
- 146. GARRETT D MAGERS
- 147. RONALD MARCAURELE JR
- 148. DAVID L MARKS
- 149. JEANNE V MASON
- 150. TIMOTHY J MCAFEE
- 151. CHARLES L MCCALLISTER
- 152. RONALD L MCCAUSLAND
- 153. DENNIS C MCCORMICK
- 154. WILLIAM B MCCOY
- 155. CHAD H MCELVEEN
- 156. GLYNN N MCGUIRE
- 157. GARY MCKINNEY
- 158. MARK A MCNEELY
- 159. LARRY H MCPEEK
- 160. BRADLEY E METHENY
- 161. JERRY B METHENY
- 162. CHRISTOPHER S
- 163. ROBERT J MITCHELL
- 164. DARRELL L MITCHELL JR
- 165. DARRELL MITCHELL SR
- 166. GARY MOAKE
- 167. MARK MONDAY
- 168. JOHN E MOORE
- 169. MICAH S MORALES
- 170. WILLIAM M MORETTI
- 171. ERIK S MULLEN
- 172. JOHN T MULLINS
- 173. BETH E NELSON
- 174. JOSHUA O NELSON
- 175. CHAD M NUTTER
- 176. JAMES W OWENS
- 177. GREGORY COYLER
- 178. ROBERT G PEEL JR
- 179. BRUCE V PEREIRA
- 180. JAMES C PHILLIPS
- 181. DARIO PICCOLOMINI
- 182. JERRED C PIERSON

- 183. DAVID R PITTS
- 184. ROBERT PITTS
- 185. MICHAEL E POE
- 186. DICKIE POLAND
- 187. GARY K POLING
- 188. SARAH L POLYOCK
- 189. DUANE A PRINCE
- 190. DALE A PUSHEY
- 191. JAMES C PUTNAM
- 192. RUBEN J QUARTANA
- 193. BRYAN J RADCLIFF
- 194. FRANK L RAYA
- 195. NATHAN R REES
- 196. MELISSA G RICHEY
- 197. RACHAEL M RICHGELS
- 198. JACK L ROBINSON
- 199. JIMMIE J ROBINSON
- 200. LINCOLN D ROBINSON
- 201. RONALD J ROBINSON
- 202. MICHAEL W RUCHTI
- 203. THOMAS F SALZMANN II
- 204. JAMES P SANDERS
- 205. ANDREW R SANKOVICH
- 206. DAVID L SARGENT
- 207. JOSHUA A SAXMAN
- 208. ALEXANDER J SCHOMERS
- 209. JOHN D SCRITCHFIELD JR
- 210. JUSTIN E SEARS
- 211. JOHN F SELL
- 212. MARK E SHAFFER
- 213. JAMES C SHAMBLIN
- 214. SHANE K SHAW-HENDERSON
- 215. ERNEST E SHEETS
- 216. TIMOTHY B SHELL
- 217. THOMAS A SHIELDS
- 218. WELTON D SHIPE
- 219. MATTHEW SHORT
- 220. JAMES D SIMMONS
- 221. CHARLES C SKIDMORE
- 222. BRANDON C SLOCUM
- 223. LARRY R SMILEY
- 224. CALVIN D SMITH
- 225. DANIEL L SMITH
- 226. JAY M SMITH
- 227. KALEB S SMITH
- 228. RICHARD A SMITH

- 229. PHILLIP B SOUTHALL
- 230. MICKY D STANTON
- 231. STEVEN A STARKEY
- 232. ERIC L STEPP
- 233. HERBERT R STERLING, III
- 234. ANDREW M STEWART
- 235. CARL F STOKLEY
- 236. ADRIAN STONE
- 237. WILLIAM O STRONG
- 238. RICHARD E STUTLER
- 239. ARNETTE S SUAZO
- 240. GABRIEL A SUAZO
- 241. RALPH E SUTER
- 242. GORDON L SWARTZ
- 243. MARK C SWIFT
- 244. CLINTON E SWISHER
- 245. MARK A TANNER
- ZACHARY C TAYLOR 246.
- GEORGE D TOMBERLIN 247.
- JESSEE D TOMBERLIN 248.
- 249. MATTHEW J TOMES
- 250. BENJAMIN K TRUMAN
- 251. DANIEL L TRUMAN
- 252. KENNETH E TRUMAN
- JAMES W TRUMP 253.
- 254. JONATHAN A TUSTIN
- 255. JEFFREY C VANWINKLE
- ARNOLD E WADE SR 256.
- 257. JAMES A WALKER
- JEREMY D WEAVER 258.
- 259. RICHARD K WEAVER
- 260. JEFFREY C WEBER
- 261. GREGORY E WEEKLEY
- 262. JOSHUA M WEST
- 263. TIMOTHY A WISE
- 264. MARTIN R WISER
- 265. LESLIE A ZINN SR
- 266. CHARLES A ZIRKLE
- 267. HOMER G ZIRKLE

JS 44 (Rev. 11/15)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS			DEFENDANTS								
THOMAS PEREZ, SECRETARY OF LABOR UNITED STATES DEPARTMENT OF LABOR, WAGE AND HOUR (b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)				TEAM ENVIRONMENTAL LLC							
				County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)							
				NOTE: IN LAND O	CONDEMI T OF LAN	OITAN VNI DN	N CASES, USE TH /OLVED.	HE LOCATION	OF		
PoliyanAto EP Hampton, (201 12th Street South- S 202-693-9382				Attorneys (If Known Webster J. Arcen BB&T Square Su Charleston, WV 2	ite 700,	300	Summers Stre	ey & Rollins eet	PLLC		
II. BASIS OF JURISDI	CTION (Place an "X" in C	ne Box Only)		TIZENSHIP OF I		[IPA]	L PARTIES	Place an "X" in			
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IV. NATURE OF SUIT											
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V. ORIGIN (Place an "X" i X 1 Original □ 2 Re	n One Box Only) moved from	Remanded from	I 4 Reir	nstated or	sferred fro	om	☐ 6 Multidistr	ict			
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VI. CAUSE OF ACTION	ON Cite the U.S. Civil St. 29 USC 201, et s	atute under which you are eq.	e filing (Do not cite jurisdictional s	tatutes uni	less div	ersity):			*	
	Failure to pay ov	ertime as required u	nder th	ie Fair Labor Stand	ards Ac	ct					
VII. REQUESTED IN CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.		D	EMAND \$			HECK YES only JRY DEMAND:					
VIII. RELATED CASI											
IF ANY	(See instructions):	JUDGE			DC)CKE	Γ NUMBER				
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